

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN MOYA
YRAPURA; ROSA ELENA AMAYA; and
HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and A.J.
DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16cv00563-TSE-TCB

NOTICE OF PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz ("Plaintiffs") are filing a Motion to File Documents under Seal ("Motion"). In support of this Motion, Plaintiffs are submitting a Non-Confidential Memorandum in Support of Plaintiffs' Motion to File Documents under Seal, along with this Notice and a Proposed Order.

This document serves as notice to the public that Plaintiffs, by counsel, have moved the Court to seal from public disclosure Exhibits 3, 4, 7, 9, and 10 to Plaintiffs' Reply in Support of Plaintiffs' Objection. A brief description of the content of these documents is as follows:

- Ex. 3: Confidential letter from VOICE, an inter-faith coalition, to Defendants regarding the Policy.

- Ex. 4: Confidential letter from Virginia Senators to Defendants regarding the Policy.
- Ex. 7: Confidential spreadsheet of audit conducted on Park's tenants' leasing files.
- Ex. 9: Excerpts from deposition transcript of A.J. Dwoskin & Associates, Inc., Waples Mobile Home Park Limited Partnership, and Waples Project Limited Partnership's designated 30(b)(6) deponent.¹
- Ex. 10: Confidential Screening Services Activation Agreement governing the relationship between Defendants and Yardi.

Objections to this Motion to File Documents Under Seal should be filed in the Civil Section of the Clerk's Office of this Court. This Notice will be posted for a minimum of 48 hours.

¹ Although Defendants did not mark this transcript "Confidential," Plaintiffs include it in Plaintiffs' Motion to Seal out of an abundance of caution.

DATED this 8th day of December, 2016 Respectfully submitted,

/s/ Paul Brinkman

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of December, 2016, I filed the foregoing document electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

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